

EXHIBIT

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From: [Joanna Makris](#)
To: [rob.beranek@clevelandcliffs.com](#); [jet@mtfn.com](#); [aperellis@perellislaw.com](#)
Cc: [George Bellas](#); [Jillian Tattersall](#); "[Jennifer Meier \(jenn.meier@comcast.net\)](#)"; [Lawrence Fromelius](#)
Subject: Notice of Objection to Expenditure from Escrow Account #1154688
Date: Thursday, June 10, 2021 3:28:59 PM
Attachments: [2021-06-10 Objections to Withdrawal.pdf](#)

Good afternoon,

Our office represents Mr. Fromelius and East Greenfield Investors LLC.

Attached please find our correspondence concerning the above-referenced escrow account number.

Best Regards,

JMakris

Joanna Makris

Paralegal

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June 10, 2021

Cliffs Mining Company
c/o Cleveland-Cliffs Headquarters
200 Public Square, Suite 3300
Cleveland, OH 44114-2315

(Sent via email to Rob.Beranek@clevelandcliffs.com)
(Sent via Certified Mail 70162710000109272586)

Joseph E. Tierney, III
Meissner Tierney Fisher & Nichols S.C.
111 E. Kilbourn Avenue, 19th Floor
Milwaukee, WI 53202

(Sent via email to jet@mtfn.com)
(Sent via Certified Mail 70162710000109272661)

Andrew Perellis
Perellis & Associates, LLC
2549 Waukegan Road, PMB 10034
Bannockburn, IL 60015

(Sent via email to aperellis@perellislaw.com)
(Sent via Certified Mail 70162710000109272678)

Chicago Title Insurance Company
20900 Swenson Drive, Suite 900
Waukesha, WI 53186

(Sent via U.S. Mail)
(Sent via Certified Mail 70162710000109272685)

NOTICE OF OBJECTION TO EXPENDITURE FROM ESCROW ACCOUNT #1154688

Acting pursuant to Section 3 of that certain Escrow Agreement dated as of August 31, 2006 by and among East Greenfield LLC, an Illinois limited liability company ("East Greenfield" or "EGI"), Cliffs Mining Company, a Delaware corporation ("Cliffs"), and Chicago Title Insurance Company, a Missouri corporation acting as escrow agent (the "Escrow Agent"), as amended in the EGI/Cliffs Settlement Agreement dated as of August 31, 2017, East Greenfield is hereby providing prompt objections to Cliffs and the Escrow Agent that it objects to the entirety of the requested expenditure from the above referenced escrow account, partial notice of which was received by EGI on May 14, 2021 and full notice of which was received by supplemental email on May 19, 2021.

According to Cliffs' notice, the requested amount is for all funds remaining in escrow and the payment is directed to Wisconsin Gas LLC, as a provider of services "performing remedial activities required or otherwise approved or authorized by EPA in payment for the performance of such services." In support of this withdrawal, Cliffs completed its Notice of Withdrawal via the provision of a Settlement document allocating funds to Wisconsin Electric Power Company and Wisconsin Gas, LLC ("WI Gas").

Upon information and belief, WI Gas is not "a provider of services" performing remedial activities required or otherwise approved or authorized by EPA in payment for the performance of such services." According to Wisconsin Gas LLC's self-provided information with Dun & Broadstreet:

Wisconsin's cold winters would be that much colder without
Wisconsin Gas' steady supply of natural gas to residential,

commercial, and industrial customers across that state. The company provides natural gas and ancillary services. Wisconsin Gas (in combination with sister companies Wisconsin Electric Power and Edison Sault) serves more than 1 million natural gas customers. The utility operates about 10,800 miles of gas mains. Wisconsin Gas distributes 40% of the natural gas consumed in Wisconsin. Along with Wisconsin Electric Power, it is a subsidiary of regional utility holding company WEC Energy. The two subsidiaries use the trade name We Energies.¹

Moreover, the Settlement Agreement and other supporting documentation provided to EGI specifically indicate that the withdrawal is both speculative and provided for potential future costs incurred.

The terms of the August 31, 2006 Escrow Agreement and the August 31, 2017 do not allow for speculative withdrawals nor do they allow for the withdrawal of funds to be paid to individuals or companies not in the business of providing remediation services as required by the EPA.

For these reasons, EGI respectfully objects to the withdrawal of any and all funds from the above referenced Escrow account and requests that Chicago Title Insurance Company, in its capacity as Escrow agent, not release such funds.

Very truly yours,



George Bellas
Attorney at Law

cc: East Greenfield Investors, LLC, c/o Larry Fromelius

¹ https://www.dnb.com/business-directory/company-profiles.wisconsin_gas_llc.1395db781a507dcb378eec121bcaee95.html